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May 25, 2023

By CM/ECF

The Honorable Laura D. Hatcher
United States Magistrate Judge
United States District Court
844 North King St.
Wilmington, DE 19801-3570

**Re: *Go Airlines (India) Limited v. International Aero Engines, LLC*,
Misc. No. 23-249-RGA-LDH**

Dear Judge Hatcher:

We, along with King & Spalding LLP, represent petitioner Go Airlines (India) Limited (“GoFirst” or “Petitioner”). Reed Smith LLP represents respondent International Aero Engines, LLC (“Respondent” or “IAE”).

The parties submit this joint letter pursuant to Your Honor’s May 22, 2023 oral order (D.I. 48, the “Order”) directing the parties to file a joint letter “informing the Court of 1) Petitioner’s response to the Tribunal’s invitation [concerning an adjournment or stay of these proceedings] ... and 2) whether the Tribunal hearing will proceed on June 25, 2023.” Your Honor also directed the parties “to attach to the joint letter their correspondence with the Tribunal regarding possible hearing dates in May.”

Petitioner has declined the Tribunal’s invitation. The parties disagree about the interpretation of the Order.

GoFirst’s Position

Because Petitioner interprets the Order as requesting a copy of Petitioner’s response to the Tribunal and because Petitioner believes that it would be unfair for the Court to have a copy of Respondent’s submission to the Tribunal on this issue without a copy of Petitioner’s response, Petitioner attaches a copy of its response declining the Tribunal’s invitation as Exhibit A hereto to the extent it is responsive to the Order.

IAE’s Position

As reflected in the attached correspondence with the Tribunal, and in light of GoFirst’s stated unavailability to go forward with a hearing on IAE’s Application to Vacate or Modify the Interim Awards on May 26, 27 or 28 2023, IAE invited GoFirst to consent to a stay or adjournment

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of the proceedings before this Court. The Merits Tribunal made the same invitation to GoFirst on May 19, 2023, requesting a response by May 24, 2023.

GoFirst submitted its letter to the SIAC Merits Tribunal on the morning of May 25, 2023 (Singapore Standard Time) requesting the Merits Tribunal to “reconsider” its invitation to GoFirst to stay these proceedings. IAE will respond directly to the Merits Tribunal in relation to GoFirst’s letter. IAE has objected to GoFirst’s inclusion of its letter to this correspondence as it was not requested by this Court, and it contains a one-sided argument to which IAE has not yet had a chance to review and respond before the Merits Tribunal. The Merits Tribunal directed IAE to provide its response to GoFirst’s letter by May 27, 2023, after which the Tribunal stated that it “will issue its decision.”

* * *

The parties jointly report that the hearing before the Tribunal on IAE’s Application to Vacate or Modify the Interim Awards will go forward on June 25, 2023.

Finally, per the Court’s Order, the email chain with the Tribunal regarding possible hearing dates (from May 11, 2023 through May 19, 2023) is attached as Exhibit B hereto.

Respectfully submitted,

WILSON SONSINI GOODRICH &
ROSATI
Professional Corporation

/s/ Andrew D. Cordo

Andrew D. Cordo (#4534)

Enclosures

cc: Clerk of the Court (by CM/ECF)
Brian Rostocki, Esquire (by CM/ECF)